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**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

AMERICAN FEDERATION OF  
GOVERNMENT EMPLOYEES, *et al.*

Plaintiffs,

v.

UNITED STATES OFFICE OF PERSONEL  
MANAGEMENT, *et al.*,

Defendants.

Case No. 3:25-cv-1780-WHA

**DECLARATION OF FLORENCE FELIX-  
LAWSON IN COMPLIANCE WITH  
SEPTEMBER 12, 2025 ORDER ON CROSS-  
MOTIONS FOR SUMMARY JUDGMENT**

1 I, Florence Felix-Lawson declare, pursuant to 28 U.S.C. § 1746, as follows:

2 1. I am the Chief Human Capital Officer for the Social Security Administration  
3 (“SSA”). I have served in the Chief Human Capital Officer position since November 2024.

4 2. Consistent with paragraph 6 of page 37 of the Court’s September 12, 2025 Order  
5 on Cross-Motions for Summary Judgment, SSA has issued individually-addressed corrective  
6 notices to each probationary employee at issue in this litigation advising them that their  
7 “termination was not performance or conduct based.” As further ordered, the corrective notices  
8 do not contain further statements from SSA concerning the validity of this Court’s ruling or  
9 SSA’s opinions on this Court’s ruling. An example of such notice is being filed  
10 contemporaneously with this declaration.

11 3. Consistent with paragraph 3 of page 37 of the Court’s September 12, 2025 Order  
12 on Cross-Motions for Summary Judgment, SSA has updated personnel files, including SF-50s  
13 for each probationary employee at issue in this litigation to reflect that their termination “was not  
14 performance or conduct based.”

15 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true  
16 and correct.

17 Dated: November 5, 2025

18  
19  
20  
21 /s/ *Florence Felix-Lawson*

22 FLORENCE FELIX-LAWSON  
23 CHIEF HUMAN CAPITAL OFFICER  
24 SOCIAL SECURITY ADMINISTRATION  
25  
26  
27  
28



## SOCIAL SECURITY

Social Security Administration  
HR - 600 W. Madison Street, 3<sup>rd</sup> Floor; Chicago, IL 60661

November 3, 2025



This corrective notice is provided to you pursuant to an order issued on September 12, 2025, by the United States District Court for the Northern District of California in the case *American Federation of Government Employees v. U.S. Office of Personnel Management*, No. 3:25-cv-1780-WHA (N.D. Cal.).

As required by Paragraph 5 of the district court's order, the Social Security Administration informs you that you were not terminated on the basis of your personal performance.

As required by Paragraph 3 of that order, the Social Security Administration has updated your personnel file, including your SF-50, to reflect that your termination was not performance or conduct based.

Sincerely,

/s/ Florence Felix-Lawson

Florence Felix-Lawson  
Chief Human Capital Officer  
Social Security Administration

## NOTIFICATION OF PERSONNEL ACTION

|  |  |                              |                               |
|--|--|------------------------------|-------------------------------|
| 1. Name (Last, First, Middle)<br>CROMARTIE, CARMEN D | 2. Social Security Number<br>547-55-2640 | 3. Date of Birth<br>02/09/77 | 4. Effective Date<br>02/21/25 |
|--|--|------------------------------|-------------------------------|

## FIRST ACTION

|                  |                                     |
|------------------|-------------------------------------|
| 5-A. Code<br>002 | 5-B. Nature of Action<br>CORRECTION |
|------------------|-------------------------------------|

## SECOND ACTION

|                  |                                      |
|------------------|--------------------------------------|
| 6-A. Code<br>357 | 6-B. Nature of Action<br>TERMINATION |
|------------------|--------------------------------------|

|           |                      |
|-----------|----------------------|
| 5-C. Code | 5-D. Legal Authority |
|-----------|----------------------|

|                  |   |
|------------------|---|
| 6-C. Code<br>ZLM | 6-D. Legal Authority<br>CO C25-01780 WHA DTD 09/12/25 |
|------------------|---|

|           |                      |
|-----------|----------------------|
| 5-E. Code | 5-F. Legal Authority |
|-----------|----------------------|

|           |                      |
|-----------|----------------------|
| 6-E. Code | 6-F. Legal Authority |
|-----------|----------------------|

## 7. FROM: Position Title and Number

SENIOR REAL-TIME CAPTIONER  
SENIOR REAL-TIME CAPTIONER  
TEH11 04E0790

## 15. TO: Position Title and Number

|                   |                      |                       |                     |                              |                     |
|-------------------|----------------------|-----------------------|---------------------|------------------------------|---------------------|
| 8. Pay Plan<br>GS | 9. Occ. Code<br>0301 | 10. Grade/Level<br>13 | 11. Step/Rate<br>01 | 12. Total Salary<br>\$120579 | 13. Pay Basis<br>PA |
|-------------------|----------------------|-----------------------|---------------------|------------------------------|---------------------|

|              |               |                 |               |                        |               |
|--------------|---------------|-----------------|---------------|------------------------|---------------|
| 16. Pay Plan | 17. Occ. Code | 18. Grade/Level | 19. Step/Rate | 20. Total Salary/Award | 21. Pay Basis |
|--------------|---------------|-----------------|---------------|------------------------|---------------|

|                            |                                |                                 |                        |
|----------------------------|--------------------------------|---------------------------------|------------------------|
| 12A. Basic Pay<br>\$ 90025 | 12B. Locality Adj.<br>\$ 30554 | 12C. Adj. Basic Pay<br>\$120579 | 12D. Other Pay<br>\$ 0 |
|----------------------------|--------------------------------|---------------------------------|------------------------|

|                |                    |                     |                |
|----------------|--------------------|---------------------|----------------|
| 20A. Basic Pay | 20B. Locality Adj. | 20C. Adj. Basic Pay | 20D. Other Pay |
|----------------|--------------------|---------------------|----------------|

## 14. Name and Location of Position's Organization

SOCIAL SECURITY ADMINISTRATION  
COMMUNS  
OFC PUB INQRS & COMMUNS SUPRT  
DIV COMMUNICATIONS SUPPORT  
ASSISTIVE COMMUNICATIONS TEAM

## 22. Name and Location of Position's Organization

## EMPLOYEE DATA

|  |   |                                  |   |
|--|---|----------------------------------|---|
| 23. Veterans Preference<br>1 - None<br>2 - 5-Point<br>3 - 10-Point/Disability<br>4 - 10-Point Compensable<br>5 - 10-Point Other<br>6 - 10-Point/Compensable/30%<br>1 | 24. Tenure<br>0 - None<br>1 - Permanent<br>2 - Conditional<br>3 - Indefinite<br>2 | 25. Agency Use                   | 26. Veterans Preference for RIF<br>YES <input checked="" type="checkbox"/> NO <input checked="" type="checkbox"/> |
| 27. FEGLI<br>BASIC ONLY<br>C0  | 28. Annuitant Indicator<br>9 NOT APPLICABLE                                       | 29. Pay Rate Determinant<br>0    |   |
| 30. Retirement Plan<br>KF FERS-FRAE & FICA   | 31. Service Comp. Date (Leave)<br>01/12/25  | 32. Work Schedule<br>F FULL-TIME | 33. Part-Time Hours Per<br>Biweekly<br>Pay Period   |

## POSITION DATA

|   |  |                                   |                                    |
|---|--|-----------------------------------|------------------------------------|
| 34. Position Occupied<br>1 - Competitive Service<br>2 - Excepted Service<br>3 - SES General<br>4 - SES Career Reserved<br>1 | 35. FLSA Category<br>E - Exempt<br>N - Nonexempt<br>N  | 36. Appropriation Code<br>4000241 | 37. Bargaining Unit Status<br>2457 |
| 38. Duty Station Code<br>24-1698-005  | 39. Duty Station (City - County - State or Overseas Location)<br>WOODLAWN,BALTIMORE,MARYLAND |                                   |                                    |

|                        |            |                   |                    |                    |   |
|------------------------|------------|-------------------|--------------------|--------------------|---|
| 40. Agency Data<br>CLS | FUNC<br>00 | 41. VET-STAT<br>X | 42. EDUC LVL<br>09 | 43. SUPV STAT<br>8 | 44. POSITION SENSITIVITY<br>NONSENSITIVE/LOW RI |
|------------------------|------------|-------------------|--------------------|--------------------|---|

## 45. Remarks

CORRECTS ITEM NUMBER 5-A FROM 385  
CORRECTS ITEM NUMBER 5-B FROM TERMINATION DURING PROB/TRIAL PER  
CORRECTS ITEM NUMBER 5-C FROM L2M  
CORRECTS ITEM NUMBER 5-D FROM REG 315.804  
CORRECTS ITEM 45 TO READ: !  
EMPLOYEE TERMINATED DURING PROBATIONARY PERIOD. TERMINATION WAS NOT  
PERFORMANCE OR CONDUCT BASED.

|  |  |                               |
|--|--|-------------------------------|
| 46. Employing Department or Agency<br>SZ - SOCIAL SECURITY ADMIN | 50. Signature/Authentication and Title of Approving Official<br>MONIQUE CEPHAS<br>ASSOC COMM, OHR<br>253516887 |                               |
| 47. Agency Code<br>SZ00  | 48. Personnel Office ID<br>1166  | 49. Approval Date<br>10/30/25 |